1 INTRODUCTION

This Operations, Monitoring, and Maintenance Plan (OMMP) for the cleanup of a polychlorinated biphenyl (PCB) sediment deposit (denoted the Upriver Dam Cleanup Project) located in Spokane County, Washington is one of the elements of the Draft Final Design Submittal. This OMMP was prepared to comply with the requirements described in the Consent Decree (CD) executed in August 2005 between Washington State Department of Ecology (Ecology) and Avista Development, Inc. (Avista), which is included as an exhibit to the Cleanup Action Plan (CAP) prepared by Ecology for the site (Ecology 2005). Remedial design/remedial action (RD/RA) activities will be performed in compliance with the Washington Administrative Code (WAC), Washington's Sediment Management Standards (SMS) (Ecology 1995a; WAC 173-204), and the Model Toxics Control Act (MTCA) (Ecology 2001; WAC 173-340), as set forth in the CD.

This OMMP describes how the Upriver Dam Cleanup Project will be implemented to comply with requirements described in the CD and CAP. This OMMP has been prepared on behalf of the project sponsor (Avista) who will oversee operations, maintenance, and monitoring at the site. Anchor Environmental, L.L.C. (Anchor), and/or other consultants will assist Avista in these activities as necessary.

The purpose of this document is to describe the post-remedial action environmental monitoring activities for the construction completed at Deposit 1 of the Upriver Dam Cleanup Area and the steps necessary to assess successful completion of the work. Remedial action will also be conducted at Deposit 2, near Donkey Island; however, long-term sampling, monitoring, and institutional controls are not required in that part of the site. This document identifies for Ecology the quality assurance/quality control (QA/QC) steps to be used to perform initial baseline sampling and long-term operation, maintenance, and monitoring of the Upriver Dam Cleanup Project, including monitoring actions and reporting mechanisms. The OMMP in conjunction with the Sampling and Analysis Plan (SAP; Appendix D of the Engineering Design Report) identifies specific objectives, rationale, and methods to assess the long-term performance of the cleanup remedy. The document describes how environmental monitoring will be performed and how response actions will be directed, as necessary, based on the monitoring results. Further, it delineates the quality assurance methods and protocols for

project personnel to ensure that all have a complete understanding of monitoring, feedback, and adjustment mechanisms.

Long-term performance and confirmation monitoring activities are scheduled to be the basis of Ecology's 5-year review of the effectiveness of the remedial action. Sampling events will occur in Years 2 and 4 following cap construction.

The Construction Quality Assurance Plan (CQAP; Appendix B of the Engineering Design Report) is an accompanying document that describes the steps to be undertaken during construction to obtain regulatory approval of the remedial action's completion.

The SAP (Appendix D of the Engineering Design Report) is another accompanying document that specifies procedures that ensure sample collection, handling, and analysis will result in data of sufficient quality to evaluate the effectiveness of remedial actions at Deposit 1.

The sections below describe the monitoring data quality objectives including the type, number, and location of samples to be collected; the frequency of sample collection; the sampling methods to be used; the analyses to be performed; and the procedures and schedule for reporting. The OMMP also includes a description of threshold or triggering criteria, and a description and schedule of corrective actions to be implemented in the event that these criteria are exceeded.

The monitoring activities discussed in subsequent sections of this OMMP are described below:

- Section 2. The responsibilities and authorities of key project personnel, contractors, and all organizations involved in the remedial action.
- **Section 3**. Routine Monitoring Events
- Section 4. Unscheduled Monitoring Events
- Section 5. Schedule
- Section 6. Corrective Actions
- **Section 7**. Reporting